



CF Industries, Inc.

Bartow Phosphate Complex

August 22, 1997

Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens, MDWC-05
P. O. Box 12233
Research Triangle Park, NC 27709

**Subject: Proposed Listing of Sulfuric Acid Mist in the
Report on Carcinogens, Ninth Edition**

Dear Dr. Jameson:

In the July 11, 1997, issue of the Federal Register (62 Fed. Reg. 37,272), the U.S. Department of Health and Human Services (HHS) requests public comment on its intent to evaluate whether 14 substances and mixtures are known to be human carcinogens. One of the identified substances is Sulfuric Acid Mist.

CF Industries, Inc., is owned by 11 North American regional farmers cooperatives and supplies over 20% of the phosphate fertilizer used in North America. CF produces approximately 2.5 million tons of sulfuric acid annually which is used in the production of phosphate fertilizers. Collectively the fertilizer industry is the largest group of manufacturers and users of sulfuric acid in the United States.

CF Industries, Inc., supports the comments submitted by The Fertilizer Institute (TFI) and the Chemical Manufacturers Association-Inorganic Acid Mist (CMA-IAM) Panel that the scientific information available is inadequate to conclude that Sulfuric Acid Mist is either a known human carcinogen or can be reasonably anticipated to be a human carcinogen.

To our knowledge there has been no epidemiological evidence presented nor controlled study undertaken which supports the listing of Sulfuric Acid Mist as a known human carcinogen. Scientific research used by the International Agency for Research on Cancer (IARC) was directed at strong inorganic

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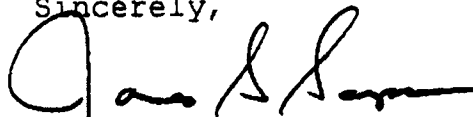
mists, not at sulfuric acid in all forms. Furthermore, those studies, which represent only the first step in a carcinogenic risk assessment, fail to adequately consider the confounding effects of elements such as smoking and alcohol consumption. Quantitative extrapolation from experimental data to the human situation is not undertaken by the IARC.

An epidemiological study of mortality in relation to work experience in the Florida Phosphate industry was conducted in the 1980s and updated in 1995. The study, which included over 24,000 workers employed in the industry between 1949 and 1978, found no evidence of causal associations of lung cancer or of general mortality with specific exposures, including acid mists.

The decision to designate Sulfuric Acid Mist as a human carcinogen has the potential to significantly impact CF Industries, Inc., and the fertilizer industry. As you are aware, careful consideration of sufficient defensible scientific information is essential prior to making this decision. The studies considered by the 1991 IARC work group considering acid mists are seriously flawed and should not be considered sufficient scientific evidence to determine whether Sulfuric Acid Mist should be listed as a known human carcinogen.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "J. G. Sampson", written over a horizontal line.

J. G. Sampson, Director
Environmental Affairs

cc: A. L. Holmes, CF
R. L. O'Brien, CF
D. J. Bowden, CF
M. L. Rajchel, FPC
J. M. Skillen, TFI